

EXHIBIT 68-15



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Attorney for Defendants (except Brian and Corrina Colvin)**

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on behalf of all others similarly situated;

Plaintiff,

Y.

Stavatti Aerospace. Ltd, a Minnesota corporation; Stavatti Aerospace Ltd, a Wyoming corporation; Stavatti Corporation, a Minnesota corporation; Stavatti Immobileare. Ltd. A Wyoming corporation; Stavatti Niagara, Ltd. A New York corporation; Stavatti Super Fulcrum, Ltd, a Wyoming corporation; Stavatti Ukraine, a Ukrainien business entity; Stavatti Heavy Industries Ltd. a Hawaii corporation; Christopher Beskar and Maja Beskar, husband and wife; Brian Colvin and Corrina Colvin, husband and wife; John Simon and Jean Simon husband and wife ; William Mcewen and Patricia Mcewen, Husband and wife; Rudy Chacon and Jane Doe Chacon. Husband and wife; and DOES 1-10, inclusive

Defendants.

Defendant Rudy Chacon, by and through legal counsel, hereby responds to Plaintiff's above referenced discovery document dated December 12, 2024.

REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1:

Admit that Plaintiff brought you \$1 million in cash to deliver to Stavatti Aerospace Ltd.

Case No. 2:23-CV-00226-DJH

**DEFENDANTS' RESPONSES
TO PLAINTIFF'S FIRST SET
OF REQUESTS FOR
ADMISSIONS, REQUESTS
FRO PRODICTIUON, NON-
UNIFORM INTERROGARIES,
AND UNIFORM
INTERROGATORIESW TO
DEFENDANT RUDY CHACON**

**(Assigned to the Honorable
Diane J. Humetewa)**

1 **ADMIT** x

DENY _____

2 **REQUEST FOR ADMISSION NO. 2:**

3 Admit that Plaintiff counted the \$1 million in front of you.

4 **ADMIT** x

DENY _____

5 **REQUEST FOR ADMISSION NO. 3:**

6 Admit that while Plaintiff counted the \$1 million, you were on the phone with
7 Defendant Brian Colvin, President of Stavatti Aerospace Ltd.

8 **ADMIT** _____

DENY x

9 **I have come to learn that Brian Colvin was not President of Stavatti Aerospace Ltd. as
10 he had represented.**

11 **REQUEST FOR ADMISSION NO. 4:**

12 Admit that you and Defendant Brian Colvin worked together to find investors for
13 Stavatti Aerospace Ltd.

14 **ADMIT** x

DENY _____

15 **REQUEST FOR ADMISSION NO. 5:**

16 Admit that you delivered \$900,000.00 of Plaintiff's cash to Stavatti Aerospace Ltd.

17 **ADMIT** _____

DENY x

18 **I delivered \$1,000,000 to Brian Colvin who represented himself to be President of
19 Stavatti Aerospace Ltd.**

20 **REQUEST FOR ADMISSION NO. 6:**

21 Admit that you kept \$100,000.00 of Plaintiff's cash.

22 **ADMIT** _____

DENY x

23 **I delivered \$1,000,000 to Brian Colvin who represented himself to be President of
24 Stavatti Aerospace Ltd. I did not receive any funds or commissions from said funds.**

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1 None applicable

2 **REQUEST FOR PRODUCTION NO. 2:**

3 Produce any and all documents between you and Defendant Brian Colvin regarding
4 finding investors for Stavatti Aerospace Ltd.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

6 None.

7 **REQUEST FOR PRODUCTION NO. 3:**

8 Produce any and all phone records from February 25, 2022 through February 27, 2022.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

10 I have no phone records for that period.

11 **REQUEST FOR PRODUCTION NO. 4:**

12 Produce any and all communications between you and any other Defendant.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

14 The only communications I had with any of the other Defendants in this lawsuit were
15 with Brian Colvin and I do believe any of that communication was in writing.

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17 DATED this 13th day of January 2025

18 BY /s/ Terry Dunmire
19 Terrance D. Dunmire

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2 VERIFICATION
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STATE OF ARIZONA)
3) SS
4 County of Maricopa)

5 Rudy Chacon, being first duly sworn upon his oath deposes and says under penalty of
6 perjury that he is one of the Defendants in the above referenced case; that he has read the
7 forgoing responses to Plaintiff's **FIRST SET OF REQUESTS FOR ADMISSIONS. REQUESTS FOR**
PRODUCTION. NON-UNIFORM INTERROGATIVES, AND UNIFORM INTERROGATORIES TO
8 **DEFENDANT RUDY CHACON** and knows the contents thereof; that the same is true, except
as to those allegations made upon information and belief, and as to those he believes them
to be true.

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10 *Rudy Chacon*
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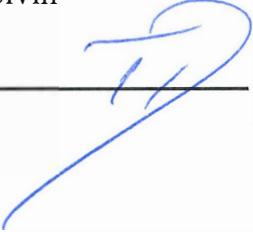
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Rudy Chacon

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3 CERTIFICATE OF SERVICE Terrance Dunmire hereby certifies that on this
4 13th day of January 2025, he electronically transmitted the attached document to the
5 following individuals:

6 George K. Chebat, Esq.
7 Enara Law PLLC
8 7631 East Greenway Road. Suite B-2
9 Scottsdale, Arizona 85260
george@enaralaw.com
10 Attorney for Plaintiff

11 Nino Abate. Esq.
12 The law Office of Nino Abate. PLC
13 300 W. Clarendon Ave., Suite 130
14 Phoenix, Arizona 85013
nino@abatelaw.com
15 Attorney for Brian and Corrina Colvin

16 By: /s/ Terry Dunmire 
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